

Hope A. Del Carlo, OSB No. 00241  
OREGON LAW CENTER  
921 SW Washington Street, Suite 516  
hope\_delcarlo@hotmail.com  
Telephone: (503) 789-7372  
Facsimile: (503) 253-3208

Mark E. Griffin, OSB No. 76152  
R. Bradley Griffin, OSB No. 072390  
GRIFFIN & MCCANDLISH  
215 SW Washington St., Suite 202  
Portland, OR 97204  
mark@markgriffin.com  
Telephone: (503) 224-2348  
Facsimile: (503) 224-3634

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON**

JUSTIN JAMES and NICOLE JAMES, ) No. 3:08-CV-397-BR

Plaintiffs, )

v. )

FREMONT REORGANIZING COMPANY, )  
fka FREMONT INVESTMENT & LOAN )  
COMPANY, a California corporation; )  
BRIDGE CAPITAL CORPORATION, a )  
California corporation; and HSBC BANK )  
USA NA, a national banking association )

PLAINTIFFS' ANSWER TO  
DEFENDANT FREMONT  
REORGANIZING COMPANY'S  
COUNTERCLAIMS

Defendants )

**ANSWER TO COUNTERCLAIMS**

COME NOW Plaintiffs Justin and Nicole James and for their answer to Defendant  
Fremont Reorganizing Company's Counterclaim allege:

1.

In response to paragraph 3.1, plaintiffs deny that the notes and trust deeds at issue in  
this case provide a basis for recovery of attorney fees by Fremont, and deny that Fremont has

1 any continuing rights or interest with respect to the plaintiffs' properties..

2 2.

3 Plaintiffs deny all allegations contained in paragraph 3.2

4  
5 WHEREFORE, having fully answered Defendant Fremont's Counterclaims, Plaintiffs pray  
6 for relief:

- 7 1. That Defendant Fremont's Counterclaim be dismissed with prejudice;  
8 2. That the Court grant such other and further relief as the court may deem just.

9  
10 Dated: May 4, 2009.

11 By: /s/ R. Bradley Griffin  
12 Mark E. Griffin, OSB 76-152  
13 R. Bradley Griffin, OSB 072390  
14 GRIFFIN & MCCANDLISH  
15 Waldo Block, Suite 202  
215 SW Washington Street  
Portland, Oregon 97204

16 Hope A. Del Carlo, OSB No. 00241  
17 OREGON LAW CENTER  
921 SW Washington St., Suite 516  
18 Portland, OR 97205

19 Of Attorneys for Plaintiffs  
20  
21  
22  
23  
24  
25  
26